

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSION SECRETARY
LEGAL
WORKING FILE**

FROM: CAROLEE HALL

DATE: JANUARY 11, 2012

**RE: ELECTRIC LIGHTWAVE, LLC dba INTEGRA TELECOM'S
(INTEGRA) PETITION FOR A WAIVER OF FCC THRESHOLD
REQUIREMENTS FOR NUMBERING RESOURCES IN IDAHO'S
BOISE RATE CENTER; CASE NO. ELI-T-11-01.**

BACKGROUND

On December 20, 2011, Electric Lightwave, LLC, dba: Integra Telecom (Integra), filed a petition on behalf of one of its customers asking for a waiver for numbering resources. Integra is requesting that this Commission grant a waiver of the numbering resource guidelines in order to secure a full, 10,000 – number code block for one of its large customers that is consolidating much of its business and IT operations within the Boise rate center.

The Application was denied by NANPA because the current telephone numbers held by Integra are available and the months-to-exhaust and utilization requirements are not adequately being met. Staff reviewed the confidential Application of Integra's customer and determined that the resource requirements would warrant the opening of a code in the Boise Rate Center. Specifically, the Application requested sequential number that Integra could not provide given its current inventory.

STAFF ANALYSIS

Integra participates in the thousand-block-pooling in the Boise rate center. Methods such as pooling and rate center consolidation help make number conservation efforts more effective and are designed to extend the time it takes to exhaust a rate center's numbering resources. After

evaluating Integra's waiver request, Staff believes that granting this waiver will not have a detrimental effect on the numbering resources in the Boise rate center. There remains a high demand for numbering resources within the Boise rate center; therefore, it is unlikely that any resources will be stranded or unusable in the immediate future.

According to FCC orders and numbering guidelines, carriers may appeal NANPA decisions of this nature to the appropriate state regulatory authority. This Commission has granted similar waivers in the past to meet the requests of other carriers.¹

RECOMMENDATION

Staff recommends that the request for a waiver be granted to Integra for its customer, with the caveat that all numbers be used sequentially and that any unused thousands blocks be returned to the pool within six months.

COMMISSION DECISION

Does the Commission agree with Staff's recommendation?



Carolee Hall

\\udmemos/ELECTRIC LIGHTWAVE, LLC dba INTEGRA TELECOM'S Safety Valve Request ELL-T-11-01

¹ See Order Nos. 28769, 29279, 30351, 30427, 30983, 31031, 32049, 32122, 32273 and 32326.